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April 5, 2021

## VIA ECF

Hon. Sanket J. Bulsara U.S. Magistrate Judge U.S. District Court for the Eastern District of New York 225 Cadman Plaza East, Chambers 304N Brooklyn, NY 11201

Re: Brian Fischler v. Brava Home, Inc.,

<u>Civil Action No.: 1:21-cv-00380-FB-SJB (E.D.N.Y.)</u>

Dear Judge Bulsara:

This firm represents Defendant Brava Home, Inc. ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Brian Fischler ("Plaintiff"), to respectfully request a 30-day extension of time for Defendant to respond to the Complaint, up to and including May 7, 2021.

By way of background, Plaintiff commenced this action on or about January 22, 2021. (ECF No. 1.) On February 8, 2021, Defendant executed a waiver of service pursuant to Fed. R. Civ. P. 4, and Defendant's responsive pleading deadline is currently April 7, 2021. (ECF No. 7.)

This letter is the first request for an extension of Defendant's responsive pleading deadline. Defendant is requesting this extension to provide it with additional time to investigate the allegations in the Complaint, and consider a potential non-litigated resolution with counsel for Plaintiff. We have communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)